

April 6, 2022

VIA ECF

The Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan, United States Courthouse  
500 Pearl St., Courtroom 11D  
New York, New York 10007

**Re: *In re Google Digital Advertising*, 1:21-md-03010 (PKC) (all actions)**

Dear Judge Castel:

On behalf of all parties to the above-referenced MDL, the parties jointly submit the attached draft confidentiality order. This draft is a supplement to the three letters being filed simultaneously by the Plaintiffs, Google, and Meta concerning the remaining disputes among them regarding certain proposed confidentiality order provisions. This draft contains all confidentiality provisions the parties agree upon, as well as those the parties don't agree upon. As to the disagreements, this joint submission identifies the competing language being proposed by each party. The parties thought it would assist the Court to have a single proposed confidentiality order, with the parties' agreed upon provisions, and their disagreements inline in the proposed order.

The parties thank the Court in advance for its consideration of these issues.

Respectfully submitted,

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